

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LYNN TILTON; PATRIARCH PARTNERS,  
LLC; PATRIARCH PARTNERS VIII, LLC;  
PATRIARCH PARTNERS XIV, LLC; and  
PATRIARCH PARTNERS XV, LLC,

Plaintiffs,

v.

SECURITIES AND EXCHANGE  
COMMISSION,

Defendant.  
-----X

No. 15 Civ. 02472 (RA)

**NOTICE OF MOTION**


**NOTICE OF MOTION FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that upon its Memorandum of Law dated April 15, 2015, the Exhibits and Declarations submitted herewith, Plaintiffs Lynn Tilton; Patriarch Partners, LLC; Patriarch Partners VIII, LLC; Patriarch Partners XIV, LLC; and Patriarch Partners XV, LLC, by their counsel Skadden, Arps, Slate, Meagher & Flom LLP and Brune & Richard LLP, respectfully move this Court for an Order granting a preliminary injunction, enjoining the Defendant Securities and Exchange Commission from carrying out an administrative proceeding against Plaintiffs and subjecting them to a hearing before an Administrative Law Judge.

Pursuant to the scheduling order issued on April 8, 2015, answering papers will be filed by April 30, 2015; reply papers will be filed by May 5, 2015; and a hearing before the Court will take place on May 11, 2015 at 11:00 a.m.

Dated: April 15, 2015  
New York, NY

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Chris Gunther".

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